

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
(Spartanburg \_\_\_\_\_ DIVISION)

\_\_\_\_\_  
Jane Doe,  
Plaintiff,

\_\_\_\_\_  
Case No. 7:21-cv-03193-JD

v.  
\_\_\_\_\_  
Limestone University f/k/a Limestone College,  
Defendant.

**Motion  
in Support of  
Pro Hac Vice Application**

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that  
\_\_\_\_\_  
Liz J. Shepherd be admitted *pro hac vice* in the above-captioned case as associate counsel.  
As local counsel, I understand that:

1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*; and
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted *pro hac vice*; and
4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.
5. Certification of Consultation (Local Civil Rule 7.02).

- ☒ Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as to this Motion: ☐ will likely oppose; ☒ does not intend to oppose
- ☐ Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s):
- \_\_\_\_\_
- \_\_\_\_\_

- ☐ No duty of consultation is required because the opposing party is proceeding pro se.

\_\_\_\_\_  
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\_\_\_\_\_  
J. Edward Bell, III  
Name of Local Counsel  
\_\_\_\_\_  
/s/ J. Edward Bell, III  
Signature of Local Counsel  
\_\_\_\_\_  
Local Counsel for the Plaintiff, Jane Doe  
\_\_\_\_\_  
District of South Carolina  
Federal Bar Number 1280

revised 09/19/05